

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

ELIZABETH SINES, SETH WISPELWEY,)
MARISSA BLAIR, TYLER MAGILL, APRIL)
MUNIZ, HANNAH PEARCE, MARCUS MARTIN,)
NATALIE ROMERO, CHELSEA ALVARADO,)
AND JOHN DOE,)
Plaintiffs)
VS.) CIVIL ACTION
NO. 3:17-cv-00072-NKM
JASON KESSLER, ET AL.,)
Defendants)

VIDEOTAPED ORAL DEPOSITION OF
THOMAS RYAN ROUSSEAU
OCTOBER 16, 2019

JOB #169672

1 VIDEOTAPED ORAL DEPOSITION OF

2 THOMAS RYAN ROUSSEAU, produced as a witness at the
3 instance of the PLAINTIFFS, and duly sworn, was taken in
4 the above-styled and numbered cause on the 16th day of
5 October, 2019, from 9:07 a.m. to 4:29 p.m., before
6 Kathryn R. Baker, CSR, RPR, in and for the State of Texas,
7 reported by machine shorthand, at the offices of U.S.
8 District Court Clerk, 501 W. 10th Street, Suite 310, in
9 the City of Fort Worth, State of Texas, pursuant to the
10 Federal Rules of Civil Procedure.

1 THOMAS RYAN ROUSSEAU

2 Q. (BY MR. SIEGEL) I'm handing you a document
3 that's been previously marked as Exhibit 4.

4 A. (Witness reviews document.)

5 Q. This is an order from the court in the Sines v.
6 Kessler litigation. If you look at the first sentence, it
7 says, This matter is before the Court on plaintiff's
8 motion for leave to depose non-party Thomas Ryan Rousseau,
9 as an authorized representative for Defendant Vanguard
10 America. For reasons stated in plaintiff's motion, the
11 motion is granted.

12 Do you see that?

13 A. Yes.

14 Q. Do you understand that you're here as a
15 representative of Vanguard America?

16 A. I understand that that's what the document says,
17 yes.

18 Q. Understood.

19 Could you do me a favor, just lower the
20 papers for the video, so you don't hold it in front of
21 your face.

22 A. (Witness nods head affirmatively.)

23 Q. Thank you.

24 Have you ever gone by a different name,
25 other than your full legal name?

THOMAS RYAN ROUSSEAU

Q. -- affiliated with Vanguard America?

A. No.

Q. Okay. Do you know personally everyone who has posted to a Discord server --

A. No.

Q. -- operated by Vanguard America?

A. No, I didn't know everyone personally.

Q. Have you read everything that's ever been posted to a Discord server --

A. No.

Q. -- affiliated with Vanguard America?

A. No. But I would like to reiterate, I never received any piece of information, evidence, knowledge whatsoever, nor have I ever heard anyone claim to have any piece of information, evidence, knowledge whatsoever that implies that Fields was in any way associated with the organization, other than the fact he was geographically present.

The Queen of England could have been on the servers for all possibility. For all it's possible, anyone could have been there.

But the fact is that there's no knowledge whatsoever to claim that he was. And there's no evidence that I've ever seen, nor anyone who I've ever communicated

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13) NO. 3:17-cv-00072-NKM

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15 Defendants)

16 REPORTER'S CERTIFICATION

17 ORAL DEPOSITION OF THOMAS RYAN ROUSSEAU

18 OCTOBER 16, 2019

19 I, Kathryn R. Baker, RPR, a Certified Shorthand
20 Reporter in and for the State of Texas, hereby certify to
21 the following:

22 That the witness, THOMAS RYAN ROUSSEAU, was duly
23 sworn by the officer and that the transcript of the oral
24 deposition is a true record of the testimony given by the
25 witness;

1 THOMAS RYAN ROUSSEAU

2 That the deposition transcript was submitted on
3 the 22nd day of October, 2019 to the witness or to the
4 attorney for the witness for examination, signature and
5 return to me by the 21st day of November, 2019;

6 That pursuant to information given to the
7 deposition officer at the time said testimony was taken,
8 the following includes all counsel for parties of record:

9 Mr. Joshua M. Siegel, Mr. Daniel P. Roy, III,
10 and Mr. Michael Bloch, Attorneys for the PLAINTIFFS

11 Mr. James Kolenich, Attorney for the DEFENDANTS,
JASON KELLER, ET AL.

12 Mr. John DiNucci, Attorney for the DEFENDANT,
RICHARD SPENCER

13 Mr. Justin Gravatt, Attorney for the DEFENDANT,
JAMES FIELDS

14 Mr. Brent Gleason, Attorney for the WITNESS

15 I further certify that I am neither counsel for,
16 related to, nor employed by any of the parties or
17 attorneys in the action in which this proceeding was
18 taken, and further that I am not financially or otherwise
interested in the outcome of the action.

19 That \$_____ is the deposition officer's
20 charges to the Plaintiffs for preparing the original
21 deposition transcript and any copies of exhibits;

THOMAS RYAN ROUSSEAU

Certified to by me this 22nd day of October,
2019.



KATHRYN R. BAKER, RPR, CSR #6955
Expiration Date: 04/30/2021
Firm Registration No. 615
TSG Reporting
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